

Privacy Policy

In conformity with art. 13 D.Lgs 196/03 concerning protection and management of personal data we inform that S.B.S. Consulting di Silvia E.A Siminelli (hereinafter also S.B.S. Consulting), in quality of Proprietor of the website and of the data management grants that probable personal data sent upon one's own free will in e-mail forms in our website (i.e. name, surname, personal or company's phone number, probable personal or company's address, probable Fiscal Code or VAT number) will be managed only for the following purposes:

- . to reply and give information to the User of the website concerning the services offered by S.B.S. Consulting
- . to reply concerning linguistic test evaluating the personal knowledge of the English language; to give answer and information concerning the linguistic services offered by S.B.S. Consulting
- . collecting, recording, processing, organizing, filing, storing, changes, selection, comparison, usage, cancellation of data. Data are filed up and stored by means of informatic supports, in data-bases and on paper supports inside the studio processed by the Proprietor only. Thus, suitable criteria are adopted to grant security and confidentiality. No data being sent or processed by third party in the Studio or outside the Studio. Data can be managed only and exclusively inside the studio for analysis and statistics related to our business.
- . All data can be managed only for accomplishments related to our business in order to give information about the services offered by S.B.S. Consulting, for keeping prospect contacts by means of phone, e-mail, fax and for sending probable communication, newsletters, advertising about the services offered to Customers or prospects. Data are processed for the administrative and commercial fulfillments such as invoices, offers to active Customers and prospects.
- . payments through wire are directly managed by the bank and S.B.S. Consulting is not responsible about the management of data of third parties.
- . one particular remark about business information requirement coming from users of our website either they are Customers and prospects. These requirements are processed according to the Ethics Code set up by A.N.C.I.C. (Associazione Nazionale tra le imprese di Informazioni Commerciali) concerning the Informative about the management of personal and business data for business information purposes G.U. n 238 dated 13.10.2015 approved by the "Garante" (guarantor). This even though S.B.S. Consulting is not subscriber of the A.N.C.I.C. web portal. The exchange of information is only and strictly confidential between S.B.S. Consulting and the Customer. S.B.S. Consulting is not responsible of any inappropriate usage of information and about the data resulting from public official resources which allow to draw up a business report about companies. S.B.S. Consulting moreover does not offer any kind of investigation at commercial purpose on private people observing the present norms related to privacy. The public and official sources used are Chambers of Commerce, public directories, registries and public archives or included in acts or public documents which are generally accessible among these also newspapers on paper or on the web which are available to anybody. Information can be required also as list forms for sectors or categories for markets analysis, marketing and commercial purposes related to the services offered by S.B.S. Consulting and with the purpose of markets and competitors analysis, business partnership opportunity. S.B.S. Consulting is not responsible of the data usage of the Customer. Collected information are processed only by the Proprietor in the Studio by means of informatic and paper supports and come from public and official sources only; afterwards they are filed up and stored adopting criteria which grant security and confidentiality. The acquisition of sensitive data and top secret business or industrial information are

excluded. Further information about privacy matter related to Business Information are available on the portal: www.informativaprivacyancic.org. About Ethics Code it is possible to refer to www.garanteprivacy.it.

PERSONAL DATA PROTECTION:

S.B.S. Consulting has implemented reasonable technical and organizational measures designed to secure personal data and information against loss, from unauthorized access, use, abuse, disclosure, alteration and destruction of personal data. However, the Internet is an open system and we cannot guarantee that unauthorized third parties will never be able to defeat those measures or use personal information for improper purposes.

RIGHT OF ACCESS TO PERSONAL DATA:

The owner of the data has the right to obtain confirmation about the storing of his/her personal data even though they are not recorded yet, and to obtain the indication of the personal data origin, the purposes and ways the data will be processed, about the logic applied in case of the process implemented by means of electronic tools; d) the identification data of the owner, the managers and the representative according to the art. 5, comma 2; e) of the subjects or the categories of subjects to whom the personal data can be communicated or can acknowledge as representatives in charge in the territory of the State, or in charge as managers or representatives. 3. The owner of the data has the right to obtain: a) updating, changes also in case he/she shows the interest in it, the data integration; b) cancellation, changes in anonymous way, or the data blocking processed in violation of law, included those ones storing is not compulsory in consideration of the purposes these data have been collected or afterwards processed; c) the confirmation that the steps explained in a) and b) have been communicated also related to their content, about those data communicated or divulged, unless the case this accomplishment results impossible or needs a huge and disproportionate usage of means in respect to the right to be protected. 4. The owner of data has the right to object completely or in part: a) for legitimate reasons about the management of his/her personal data although pertinent about collecting purpose; b) the personal data processing with the purpose of commercial, advertising or about direct sale, marketing research or commercial communication.

Herewith we inform that the Proprietor and the responsible of the management of data is S.B.S. Consulting di Silvia E.A. Siminelli, Via Palmanova, 213/A – Milan – I.